



NATIONAL SHERIFFS' ASSOCIATION

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The Honorable Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: WT Docket No. 11-49

Dear Chairman Genachowski:

I write on behalf of the National Sheriffs Association (NSA), and the more than 3,000 elected Sheriffs nationwide that NSA represents, to express our interest in the development of improved position location technology for the E9-1-1 system. As the Federal Communications Commission (FCC) is well aware, indoor locations pose particular challenges for first responders because the location of an emergency may not be obvious, and current location services are of only limited use in providing the location of calls placed from indoors. Improving the ability of dispatchers and first responders to locate these callers has become an important public safety issue; and NSA urges the Commission to make every effort to promote the development of technologies that can help address these challenges.

NSA is aware that several companies are pursuing solutions to this matter, including Progeny LMS, LLC and its parent company, NextNav Holdings, LLC (Progeny/NextNav). We understand that Progeny/NextNav has constructed a network of Multilateration Location and Monitoring Service (M-LMS) positioning beacons throughout major U.S. cities. We also understand that this M-LMS system may be able to significantly reduce the uncertainty that currently affects wireless E9-1-1 by providing more precise location information, including the vertical location of a caller.

We have reviewed the capabilities of the Progeny/NextNav system with interest because even a modest improvement in capabilities above the current 100-300 meter standards would represent a significant benefit to public safety, particularly because current technologies do not provide any vertical location information at all. As the FCC's Communications Security, Reliability and Interoperability Council (CSRIC) has explained, emergency responders require an "actionable location," such as a specific building or, in urban areas, a particular floor in a large building. Facilitating the development of technologies that can deliver on CSRIC's call for the "smallest possible search ring" will reduce the uncertainty involved in dispatching, speed emergency response, and improve outcomes.

Although we do not endorse any particular location technology, NSA believes that M-LMS represents one of several promising avenues of development for indoor location solutions. Accordingly, in light of the importance of E9-1-1 location accuracy, we encourage the FCC to take the steps necessary to ensure that the Progeny/NextNav network can be made available to the public and to emergency responders as soon as possible.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Aaron D. Kennard". The signature is fluid and cursive, with the first name "Aaron" being more prominent than the last name "Kennard".

Sheriff (ret.) Aaron D. Kennard
Executive Director